

1 PAUL J. PASCUZZI, State Bar No. 148810  
JASON E. RIOS, State Bar No. 190086  
2 THOMAS R. PHINNEY, State Bar No. 159435  
FELDERSTEIN FITZGERALD  
3 WILLOUGHBY PASCUZZI & RIOS LLP  
4 500 Capitol Mall, Suite 2250  
Sacramento, CA 95814  
5 Telephone: (916) 329-7400  
Facsimile: (916) 329-7435  
6 Email: ppascuzzi@ffwplaw.com  
jrios@ffwplaw.com  
7 tphinney@ffwplaw.com

8 ORI KATZ, State Bar No. 209561  
9 ALAN H. MARTIN, State Bar No. 132301  
SHEPPARD, MULLIN, RICHTER & HAMPTON LLP  
10 A Limited Liability Partnership  
Including Professional Corporations  
11 Four Embarcadero Center, 17<sup>th</sup> Floor  
12 San Francisco, California 94111-4109  
Telephone: (415) 434-9100  
13 Facsimile: (415) 434-3947  
Email: okatz@sheppardmullin.com  
14 amartin@sheppardmullin.com

15 Attorneys for The Roman Catholic Archbishop of  
16 San Francisco

17 UNITED STATES BANKRUPTCY COURT

18 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

19 In re  
20 THE ROMAN CATHOLIC ARCHBISHOP  
OF SAN FRANCISCO,  
21 Debtor and  
22 Debtor in Possession.

Case No. 23-30564

Chapter 11

**AMENDED NOTICE OF HEARING ON  
DEBTOR'S SECOND MOTION FOR  
ORDER EXTENDING EXCLUSIVITY  
PERIODS [11 U.S.C. § 1121(d)]**

Date: March 7, 2024  
Time: 1:30 p.m.  
Location: Via ZoomGov  
25 Judge: Hon. Dennis Montali

26  
27 **This Amended Notice of Hearing corrects the deadline for filing and service of written**  
28 **opposition to the Motion, which is February 22, 2024 as set forth below.**

Case No. 23-30564

1       **NOTICE IS HEREBY GIVEN** that The Roman Catholic Archbishop of San Francisco,  
2 debtor and debtor-in-possession herein (“Debtor”), has filed a *Motion for Order Extending*  
3 *Exclusivity Periods* [11 U.S.C. § 1121(d)] (the “Motion”) and that a hearing on the Motion is  
4 scheduled before the Honorable Dennis Montali on March 7, 2024, at 1:30 p.m. at the United States  
5 Bankruptcy Court, Northern District of California, San Francisco Division, before the Honorable  
6 Dennis Montali (the “Hearing”). The Hearing will not be conducted in the presiding judge’s  
7 courtroom but instead will be conducted by videoconference via ZoomGov. The Bankruptcy  
8 Court’s website provides information regarding how to arrange an appearance at a video or  
9 telephonic hearing. If you have questions about how to participate in a video or telephonic hearing,  
10 you may contact the court by calling 888-821-7606 or by using the Live Chat feature on the  
11 Bankruptcy Court’s website. The link to the judge’s electronic calendar is:  
12 <https://www.canb.uscourts.gov/judge/montali/calendar>.

13       **NOTICE IS FURTHER GIVEN** that the Motion is supported by the *Declaration of*  
14 *Joseph J. Passarello in Support of Chapter 11 Petition and Debtor’s Emergency Motions* [ECF  
15 14], the *Declaration of Paul E. Gaspari in Support of Chapter 11 Petition and Debtor’s Emergency*  
16 *Motions* [ECF 15], and the additional *Declaration of Fr. Patrick Summerhays in support of this*  
17 *Motion* and the pleadings and papers on file in this case, and such other evidence and argument as  
18 may be submitted before or during the hearing on the Motion.

19       By the Motion, the Debtor seeks entry of an order pursuant to 11 U.S.C. §1121(d) extending  
20 the exclusivity periods within which Debtor has the exclusive right to propose a plan (which  
21 currently expires on March 21, 2024) and obtain acceptance of such a plan (which currently expires  
22 on May 23, 2024), until June 25, 2024 (95 days), and August 26, 2024 (95 days), respectively. The  
23 Debtor believes that the relief requested is necessary and appropriate given the early stage of the  
24 case, the complexity of the case, the steady progress in the postpetition management of the case, and  
25 the progress toward developing a process to facilitate a plan of reorganization. Further, the survivor  
26 claims bar date has not yet passed and parties in interest have not yet participated in mediation. The  
27 requested relief is without prejudice to: (a) Debtor’s right to seek further extensions and the rights  
28 of parties in interest with standing to oppose such requests, and (b) the rights of parties in interest

1 with standing to seek to shorten or terminate Debtor's exclusivity periods and Debtor's right to  
2 oppose such requests.

3 **NOTICE IS FURTHER GIVEN** that this notice does not contain all the particulars of the  
4 Motion or supporting documents, nor does it summarize all of the evidence submitted in support.  
5 For further specifics concerning the Motion and the relief requested, you are encouraged to review  
6 the Motion and the supporting evidence, including the supporting Declarations, copies of which  
7 may be obtained from the website to be maintained by the Debtor's proposed Claims and Noticing  
8 Agent, Omni Agent Solutions, Inc., at <https://omniagentsolutions.com/RCASF>, free of charge. You  
9 may also access these documents from the Court's Pacer system (requires a subscription). The web  
10 page address for the United States Bankruptcy Court for the Northern District of California is  
11 <http://www.canb.uscourts.gov>.

12 The Bankruptcy Court's website provides information regarding how to arrange a telephonic  
13 or video appearance. Counsel, parties and other interested parties may attend the hearing in person  
14 or by Zoom. Additional information is available on Judge Montali's Procedures page on the court's  
15 website. Information on attending the hearing by Zoom will be provided on Judge Montali's  
16 calendar posted on the court's website. The link to the judge's electronic calendar is:  
17 <https://www.canb.uscourts.gov/judge/montali/calendar>.

18 **NOTICE IS FURTHER GIVEN** that any opposition or response to the Motion must be  
19 in writing, filed with the Bankruptcy Court, and served on the counsel for the Debtor at the above-  
20 referenced addresses so as to be received by **February 22, 2024**. Any opposition or response must  
21 be filed and served on the Limited Service List as provided in the Interim Order Approving Motion  
22 to (1) Establish Notice Procedures, (2) File Confidential Information Under Seal, and (3)  
23 Temporarily Suspend Deadline for Filing Proofs of Claim at ECF 38. The updated Limited Service  
24 List may be obtained from the Omni website listed above. Failure to file timely opposition and  
25 appear at the hearing may constitute a waiver of your objections. Your rights may be affected. You

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1 should read these papers carefully and discuss them with your attorney, if you have one in this  
2 bankruptcy case. If you do not have an attorney, you may wish to consult one.

3 Dated: February 9, 2024

FELDERSTEIN FITZGERALD WILLOUGHBY  
PASCUZZI & RIOS LLP

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By: /s/ Jason E. Rios  
PAUL J. PASCUZZI  
JASON E. RIOS  
THOMAS R. PHINNEY

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Attorneys for The Roman Catholic Archbishop of  
San Francisco

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10 Dated: February 9, 2024

SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

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By: /s/ Ori Katz  
ORI KATZ  
ALAN H. MARTIN

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Attorneys for The Roman Catholic Archbishop of  
San Francisco

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